

ATTACHMENT H

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

RECEIVED
AUG 23 2011

BY:



SCANNED

COPY

Catherine Bleish,

Plaintiff,

v.

Master Patrolman Todd M. Moriarty
Individually and Officially,
Senior Patrolman Matthew J. DiFava,
Individually and Officially,
Senior Patrolman Timothy J. MacIsaac,
Individually and Officially,
Officer Charles MacGregor,
Individually and Officially,
Officer Eric Walker,
Individually and Officially,
Chief Donald F. Conley,
Individually and Officially,
Nashua Police Department, and
The City of Nashua,
Defendants.

Civil Action No. 11-00162-LM

**DEFENDANT CITY OF NASHUA AND NASHUA POLICE DEPARTMENT
RESPONSES TO PLAINTIFF'S FIRST SET OF INTERROGATORIES**

NOW COMES The Defendants, City of Nashua and Nashua Police Department, and
submits the following responses to Plaintiff's First Set of Interrogatories:

GENERAL OBJECTIONS

1. The Defendant objects to the definitions and instructions and each interrogatory to the extent it seeks to impose obligations upon the Defendant that is beyond those required by T
2. The Defendant objects to the Interrogatories to the extent that they seek information subject to attorney-client privilege, the work product doctrine or any other privilege or immunity which the Defendant may assert under law.
3. The Defendant objects to the Interrogatories to the extent that they seek information which was prepared in anticipation of litigation and/or for trial, including, but not limited to, communications between employees and risk management specialists.

RESPONSES

1. Please identify the person answering these questions on behalf of the Nashua Police Department, including that individual's name, date of birth social security number, marital status, and residential address.

ANSWER:

Objection. The Defendant objects to providing personal information of its employees which information is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving this objection:

Lieutenant James Maloney, Nashua Police Department

2. Please state the name, title, address, phone number and email address of all persons assisting you in answering these Interrogatories.

ANSWER:

Counsel for Nashua Police Department assisted in responding to these interrogatories.

3. Please state the name, address, phone number, and title of the individual(s) who adopt police policies and procedures on behalf of the Nashua Police Department.

ANSWER:

Objection. The Defendant objects to providing personal information of its employees. Subject to and without waiving this objection:

The City of Nashua, Chiefs of Police and Police Commissioners adopt policies and procedures for the Nashua Police Department.

4. Please provide your account of the events occurring at or around Library Hill occurring on March 20, 2010 leading up to, during and following Plaintiff's arrest. Additionally, please provide all documents that support your answer.

ANSWER:

Defendant objects to this request as it is overbroad and unduly burdensome. On the date specified, plain clothes officers attempted to arrest an individual for possession of marijuana. During the course of the arrest and transport of this individual other citizens, including the plaintiff, interfered with or otherwise obstructed the police. As a result, the plaintiff was arrested. For a more detailed description of events, Nashua Police incident report and other documents previously produced in response to Plaintiffs 91-A Request.

8/23/11

Date

James Maloney

James Maloney, Nashua Police Department

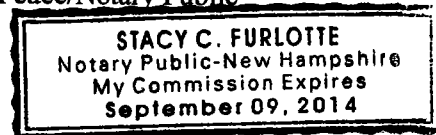
STATE OF NEW HAMPSHIRE

COUNTY OF Hillsborough

Personally appeared before me the above-named James Maloney and made oath that the statements by him subscribed are true to the best of his knowledge and belief.

Stacy C. Furlotte

Justice of the Peace/Notary Public



As to objections:

Dated: 8.22.2011

Brian J. S. Cullen

Brian J. S. Cullen, Bar #11265

10 East Pearl Street

Nashua, NH 03060

(603) 881-5500